



## **Livestock and Seed Program Audit, Review, and Compliance Branch Quality System Audit Report**

**Applicant:** Monterey County Certified Organic (MCCO)  
**Program/Audit Type:** National Organic Program – 2003 Annual Update  
**Location(s):** 1428 Abbott Street, Salinas, CA 93901  
**Audit Date(s):** May & June, 2003  
**Audit File Number:** NP3141MA  
**Action Required:** Yes  
**Auditor(s):** Miguel A. Caceres  
**Contact:** Katherine Smith-Borchard, Chief Deputy Agricultural Commissioner

### **AUDIT ACTIVITIES**

On May 20 – 21 & June 17, 2003 a representative of the USDA, AMS, LS Audit, Review, and Compliance Branch conducted a review of the annual update documents submitted by MCCO, Salinas, CA to verify continued compliance to the USDA, AMS 7 CFR Part 205, National Organic Program (NOP).

### **OBSERVATIONS**

MCCO is a functional unit within the Fruit, Vegetable and Egg Quality Standardization Division of the Agricultural Commissioner's Office in Salinas, CA. MCCO was accredited as a certifying agent for crops, livestock, wild crops and handling operations in Monterey County and neighboring counties (on a case by case basis).

A review of the material submitted by MCCO indicated they had only minor changes in their forms and administrative procedures. The certification certificate will no longer contain the California State Organic Registration Number. There were no laboratory tests conducted by MCCO and no outstanding non-compliances to address.

The following information was submitted for the review:

1. **Certification Files:** 3 crops and 3 handlers. There were no livestock or wild-crop operations certified by MCCO.
2. **Annual Program Review:** MCCO Annual Internal Audit Findings March 2003 – Minor changes were implemented as a direct result of the annual internal audit to help improve the program. All changes were administrative in nature.
3. **Performance Evaluations:** Four evaluations provided; 1 – chief deputy agricultural director, 1 – deputy agricultural commissioner and 2 inspectors.
4. **Conflict of Interest Disclosure Reports:** Provided for all four staff members. Reports were dated on various days in January 2003.
5. **Current Certification Activities:** The MCCO Client List contained 5 certified crop operations, 4 certified handler operations and 1 handler operation pending certification.

### **FINDINGS**

Almost all files and information submitted by MCCO for the annual update complied with NOP requirements. There was one continuous improvement point (CIP) identified during the review.

**NP3140MA.NC1 (CIP) Section 205.662(a)** When an inspection, review, or investigation of a certified operation by a certifying agent or a State organic program's governing State official reveals any

noncompliance with the **Act or regulations in this part**, a written notification of noncompliance shall be sent to the certified operation. *The MCCO Certified Organic Handbook; page 59 contains the California Organic Products Act of 2003. This document requires that operations register with the state and pay registration fees. Products cannot be marketed as organic unless the operation is registered. This appears to be an additional requirement and since California is not a recognized state program with additional requirements this is non-compliance with the Final Rule. The COPA of 2003 may contain other additional requirements and should be reviewed by a representative of the NOP.*

## **RECOMMENDATIONS**

I recommend MCCO retain accreditation and provide corrective action to the finding. I further recommend that the COPA of 2003 is reviewed and that a determination is made as to whether this document is acceptable and in compliance with the Final Rule.